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IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 KRISTY LYNN FELKINS,

15 Defendant.

CASE NO. 2:20-CR-00175 TLN

STIPULATION REGARDING EXCLUDABLE
TIME PERIODS UNDER SPEEDY TRIAL ACT;
FINDINGS AND ORDER

DATE: September 16, 2021

TIME: 9:30 a.m.

COURT: Hon. Troy L. Nunley

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17 STIPULATION

18 Plaintiff United States of America, by and through its counsel of record, and defendant, by and
19 through defendant's counsel of record, hereby stipulate as follows:

20 1. By previous order, this matter was set for status on September 16, 2021.

21 2. By this stipulation, defendant now moves to continue the status conference until October
22 28, 2021, at 9:30 a.m., and to exclude time between September 16, 2021, and October 28, 2021, under
23 Local Code T4.

24 3. The parties agree and stipulate, and request that the Court find the following:

25 a) The government has represented that the discovery associated with this case
26 includes voluminous documentary evidence, including complex records involving
27 cryptocurrency and anonymized internet communication. All of this discovery has been either
28 produced directly to counsel and/or made available for inspection and copying.

- 1 b) Counsel for defendant desires additional time to review the current charge,
2 analyze the discovery, and discuss plea negotiations with the government.
- 3 c) Counsel for defendant believes that failure to grant the above-requested
4 continuance would deny him/her the reasonable time necessary for effective preparation, taking
5 into account the exercise of due diligence.
- 6 d) The government does not object to the continuance.
- 7 e) Based on the above-stated findings, the ends of justice served by continuing the
8 case as requested outweigh the interest of the public and the defendant in a trial within the
9 original date prescribed by the Speedy Trial Act.
- 10 f) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,
11 et seq., within which trial must commence, the time period of September 16, 2021 to October 28,
12 2021, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code
13 T4] because it results from a continuance granted by the Court at defendant's request on the basis
14 of the Court's finding that the ends of justice served by taking such action outweigh the best
15 interest of the public and the defendant in a speedy trial.

16 4. Nothing in this stipulation and order shall preclude a finding that other provisions of the
17 Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial
18 must commence.

19 IT IS SO STIPULATED.

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21 Dated: September 14, 2021

PHILLIP A. TALBERT
Acting United States Attorney

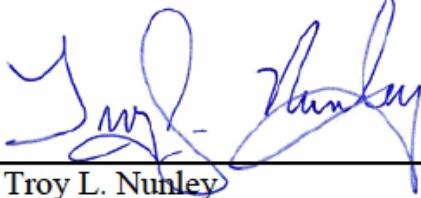
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23 _____
24 /s/ PAUL HEMESATH
PAUL HEMESATH
Assistant United States Attorney

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26 Dated: September 14, 2021

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28 /s/ LINDA C. ALLISON
LINDA C. ALLISON
Counsel for Defendant
KRISTY LYNN FELKINS

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3 **FINDINGS AND ORDER**

4 IT IS SO FOUND AND ORDERED this 14th day of September, 2021.

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9 Troy L. Nunley
10 United States District Judge

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